

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

|                |   |                                     |
|----------------|---|-------------------------------------|
| In re:         | ) | Bky. Case No.: 20-30479             |
|                | ) | Chapter 7                           |
| Raquel Flaaen, | ) |                                     |
|                | ) | <b>NOTICE AND MOTION FOR</b>        |
| Debtor.        | ) | <b>APPROVAL OF SALE OF PROPERTY</b> |
| _____          | ) |                                     |

Gene W. Doeling, the bankruptcy trustee in this case, requests that the Court approve the online auction sale of the bankruptcy estate's interest in oil, gas, and coal mineral rights on [www.ebay.com](http://www.ebay.com).

The debtor has a 1/3<sup>rd</sup> interest of a 1/11<sup>th</sup> interest in oil, gas, and coal mineral rights located in Stark County, North Dakota as follows:

**Township 140 North, Range 99 West**

Section 13: All

The auction shall run for a period of 30 days pending court approval of this motion. The trustee has filed an application to employ BKAssets.com, LLC, who shall receive a 10% commission on gross sales price, plus any applicable expenses of up to \$250 to procure any necessary legal documents, listing fees, and shipping costs. The buyer will be required to pay \$225 to offset these fees. The trustee requests that he be authorized to pay these fees immediately upon completion of the sale.

The bankruptcy estate has determined that there will be no adverse tax consequences to the bankruptcy estate as a result of this sale.

**NOTICE OF MOTION:** Your rights may be affected in this action. You should read these papers carefully and discuss the matters with your attorney if you have one. Any objections to this motion must be made within 21 days of this date with an original filed with the Clerk of Bankruptcy Court and copies served upon the bankruptcy trustee and United States Trustee at the addresses stated below. Failure to timely respond to this motion will be deemed a waiver of any objections and the Court will grant such relief as it deems appropriate.

Clerk, U.S. Bankruptcy Court  
Quentin N. Burdick U.S. Courthouse  
655 First Ave. N. – Suite 210  
Fargo, ND 58102

United States Trustee  
314 South Main Ave.  
Suite 303  
Sioux Falls, SD 57104-6462

Trustee  
(See  
address  
below)

DATE OF MAILING: January 21, 2021

/s/ Gene W. Doeling

Gene W. Doeling, Bankruptcy Trustee  
P.O. Box 9231  
Fargo, ND 58106  
(701) 232-8757

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA

IN RE: RAQUEL FLAAEN

CASE NO: 20-30479

**DECLARATION OF MAILING  
CERTIFICATE OF SERVICE**

Chapter: 7

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On 1/21/2021, I did cause a copy of the following documents, described below,

Notice and Motion for Approval of Sale of Property

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R. Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 1/21/2021

/s/ Gene W. Doeling  
Gene W. Doeling 05078  
Kaler Doeling, PLLP  
3429 Interstate Blvd. S.  
Fargo, ND 58103  
701 232 8757

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA

IN RE: RAQUEL FLAAEN

CASE NO: 20-30479

**CERTIFICATE OF SERVICE  
DECLARATION OF MAILING**

Chapter: 7

On 1/21/2021, a copy of the following documents, described below,  
Notice and Motion for Approval of Sale of Property

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document (s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 1/21/2021



Jay S. Jump  
BK Attorney Services, LLC  
d/b/a certificateofservice.com, for  
Gene W. Doeling  
Kaler Doeling, PLLP  
3429 Interstate Blvd. S.  
Fargo, ND 58103

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING  
08683  
CASE 20-30479  
DISTRICT OF NORTH DAKOTA  
FARGO  
THU JAN 21 10-23-37 CST 2021

AMERICAN EAGLE OUTFITTERS  
SYNCHRONY BANK  
PO BOX 960013  
ORLANDO FL 32896-0013

BANK OF AMERICA  
PO BOX 851001  
DALLAS TX 75285-1001

BEST BUY CREDIT SERVICES  
PO BOX 78009  
PHOENIX AZ 85062-8009

CAPITAL ONE  
PO BOX 60599  
CITY OF INDUSTRY CA 91716-0599

JPMORGAN CHASE BANK N A  
BANKRUPTCY MAIL INTAKE TEAM  
700 KANSAS LANE FLOOR 01  
MONROE LA 71203-4774

CITIBANK  
PO BOX 790034  
ST LOUIS MO 63179-0034

COMENITY FOREVER 21 VISA  
PO BOX 659820  
SAN ANTONIO TX 78265-9120

COMENITY MAURICES CREDIT CARD  
PO BOX 659704  
SAN ANTONIO TX 78265-9704

COMENITY TORRID  
PO BOX 659584  
SAN ANTONIO TX 78265-9584

COMENITY VICTORIAS SECRET  
PO BOX 659728  
SAN ANTONIO TX 78265-9728

DEPARTMENT OF THE TREASURY  
15TH PENNSYLVANIA  
WASHINGTON DC 20222-0001

~~EXCLUDE~~

~~GENE W DOELLING  
BANKRUPTCY TRUSTEE  
3429 INTERSTATE BLVD S  
PO BOX 9231  
FARGO ND 58106-9231~~

FIVE STAR REALTY  
35401 KENAI SPUR HWY  
SUITE A  
SOLDOTNA AK 99669-7625

DEBTOR

RAQUEL L FLAAEN  
1513 6TH AVE SE  
DICKINSON ND 58601-6150

HOMER ELECTRIC ASSOCIATION INC  
3977 LAKE STREET  
HOMER AK 99603-7680

AMERICAN HONDA FINANCE  
P O BOX 168088  
IRVING TX 75016-8088

INTERNAL REVENUE SERVICE  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

~~EXCLUDE~~

~~ROBERT A KEOGH  
KEOGH LAW OFFICE  
141 3RD STREET WEST  
PO BOX 1202  
DICKINSON ND 58602-1202~~

KOHL'S PAYMENT CENTER  
PO BOX 1456  
CHARLOTTE NC 28201-1456

MERRICK BANK  
PO BOX 660702  
DALLAS TX 75266-0702

PAYPAL CREDITSYNCB  
PO BOX 960006  
ORLANDO FL 32896-0006

ROBERT B RASCHKE  
ASSISTANT US TRUSTEE  
SUITE 1015 US COURTHOUSE  
300 SOUTH FOURTH STREET  
MINNEAPOLIS MN 55415-1320

SYNCBZULILY CREDIT CARD  
PO BOX 530993  
ATLANTA GA 30353-0993

SAMS CLUB MCSYNCB  
PO BOX 960013  
ORLANDO FL 32896-0013

SEARS CREDIT CARDS  
PO BOX 78051  
PHOENIX AZ 85062-8051

SECURITIES EXCHANGE COMMISSION  
175 W JACKSON BLVD  
CHICAGO IL 60604-2908

PARTIES DESIGNATED AS "EXCLUDE" WERE NOT SERVED VIA U.S. FIRST CLASS MAIL.  
PARTIES WITH A '+' AND DESIGNATED AS "CM/ECF E-SERVICE" RECEIVED ELECTRONIC NOTICE THROUGH THE CM/ECF SYSTEM

CM/ECF E-SERVICE

SYNCHRONY BANK  
CO PRA RECEIVABLES MANAGEMENT LLC  
PO BOX 41021  
NORFOLK VA 23541-1021

SYNCHRONY BANKJCP  
PO BOX 960090  
ORLANDO FL 32896-0090

TARGET CARD SERVICES  
PO BOX 660170  
DALLAS TX 75266-0170

US ATTORNEY  
655 FIRST AVENUE NORTH SUITE 250  
FARGO ND 58102-4932

WALMART WORLD MC  
CAPITAL ONE  
PO BOX 60519  
CITY OF INDUSTRY CA 91716-0519

WELLS FARGO  
PO BOX 51193  
LOS ANGELES CA 90051-5493

WELLS FARGO HOME MORTGAGE  
PO BOX 10394  
DES MOINES IA 50306-0394

(Creditor)  
Synchrony Bank  
c/o PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541  
  
claims@recoverycorp.com

(U.S. Trustee)  
Robert B. Raschke  
Assistant U.S. Trustee  
Suite 1015 U.S. Courthouse  
300 South Fourth Street  
Minneapolis, MN 55415  
  
USTPRegion12.SX.ECF@usdoj.gov

(Debtor)  
Raquel L. Flaaen  
1513 6th Ave SE  
Dickinson, ND 58601  
represented by:  
Robert A. Keogh  
Keogh Law Office  
141 3rd Street West  
P.O. Box 1202  
Dickinson, ND 58602-1202  
  
frontdesk@keogh-lawoffice.com

(Trustee)  
Gene W Doeling  
Bankruptcy Trustee  
3429 Interstate Blvd. S.  
P.O. Box 9231  
Fargo, ND 58106-9231  
  
heather@kaler-doeling.com